

0584S:

Energy Theft Tip-Off Service (ETTOS) – Release of Supplier identity

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To fulfil the terms of the ETTOS a UNC Modification is required to give the Transporter permission to release the Supplier identity, as provided by Users, of a supply point to the ETTOS Service Provider.



The Panel determined that this self-governance modification be implemented.












High Impact: N/A



Medium Impact: N/A



Low Impact: Shippers, Transporters

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About this document:		 enquiries@gasgovernance.co.uk
<p>This Final Modification Report was considered by the Panel on 21 July 2016. The Panel unanimously determined that this modification should be implemented.</p>		 0121 288 2107
Modification timetable:		Proposer: Alex Ross-Shaw
Draft Modification Report issued for consultation	16 June 2016	 aross@northerngas.co.uk
Consultation Close-out for representations	07 July 2016	 0113 397 5326
Final Modification Report available for Panel	08 July 2016	Transporter: Northern Gas Networks
UNC Modification Panel decision	21 July 2016	 aross@northerngas.co.uk
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1 Summary

Is this a Self-Governance Modification?

This modification qualifies for self-governance as it will not have a material impact on parties to the UNC, consumers or competition and is simply allowing the release of data.

Is this a Fast Track Self-Governance Modification?

This is not a house-keeping modification and therefore does not qualify for Fast-Track status.

Why Change?

As part of the Theft Risk Assessment Service (TRAS) created and managed under the SPAA, Suppliers have agreed to create and fund an ETTOS to manage tip-offs related to theft of gas across the energy industry.

To deliver the ETTOS the Supplier identity to the supply point will be required for the ETTOS Provider to match tip-offs to the relevant Supplier. This service is being introduced into SPAA on CP15/325.

Solution

This modification proposes to provide the Transporter with the necessary permissions within the UNC to release the Supplier identity of the supply point to the ETTOS Service Provider on receipt of a tip-off. This will enable the ETTOS Service Provider to provide the relevant Supplier with the tip-off information.

Relevant Objectives

Implementation of this Modification Proposal would further relevant objective d), securing of effective competition between Shippers and Suppliers as sending theft of gas tip-offs to the relevant Supplier will enable them to more effectively tackle instances of theft of gas, reducing the costs to consumers and Shippers.

Implementation will also further relevant objective f) as enabling the Transporter to release relevant data will ensure efficient administration of the UNC.

Implementation

As a self-governance modification it could be implemented sixteen Business Days after determination by the Modification Panel subject to no appeals being raised.

The go-live date for the ETTOS is 01 September 2016.

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No.

2 Why Change?

As part of the TRAS under the SPAA, Suppliers have agreed to create an ETTOS to manage tip-offs related to theft of gas across the energy industry.

To deliver the ETTOS the Supplier identity to the supply point will be required for the ETTOS Provider to match tip-offs to the relevant Supplier.

SPAA CP15/325 will introduce the service and relevant obligations on SPAA parties, however, for the service to be able to operated as intended it is necessary for Users to provide permission via the UNC for the identity of their Supplier to be made available to the ETTOS Provider.

3 Solution

This Modification Proposal will create the permissions necessary within the UNC to permit the release the Supplier identity of the supply point to the ETTOS Provider when they receive a tip-off of a potential theft of gas at a premise. This will enable the ETTOS Provider to provide the relevant Supplier with the tip-off information so that they can follow up as required.

User Pays	
Classification of the modification as User Pays, or not, and the justification for such classification.	N/A – permissions only
Identification of Users of the service, the proposed split of the recovery between Gas Transporters and Users for User Pays costs and the justification for such view.	N/A
Proposed charge(s) for application of User Pays charges to Shippers.	N/A
Proposed charge for inclusion in the Agency Charging Statement (ACS) – to be completed upon receipt of a cost estimate from Xoserve.	N/A

4 Relevant Objectives

Impact of the modification on the Relevant Objectives:	
Relevant Objective	Identified impact
a) Efficient and economic operation of the pipe-line system.	None
b) Coordinated, efficient and economic operation of (i) the combined pipe-line system, and/ or (ii) the pipe-line system of one or more other relevant gas transporters.	None
c) Efficient discharge of the licensee's obligations.	None
d) Securing of effective competition: (i) between relevant shippers; (ii) between relevant suppliers; and/or (iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers.	Positive (i) & (ii)
e) Provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards... are satisfied as respects the availability of gas to their domestic customers.	None
f) Promotion of efficiency in the implementation and administration of the Code.	Positive
g) Compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators.	None

d) Security of effective competition between Shippers and Suppliers

Implementation of this Modification Proposal would further relevant objective d), securing of effective competition between Shippers and Suppliers as sending theft of gas tip-offs to the relevant Supplier will enable them to more effectively tackle instances of theft of gas, reducing the costs to consumers and Shippers.

f) Promotion of efficiency in the implementation and administration of the Code

Ensuring that relevant permission is in place to facilitate the ETTOS will improve the efficiency of administration of code elements relevant to theft of gas.

5 Implementation

As self-governance procedures are proposed, implementation could be sixteen Business Days after a UNC Modification Panel decision to implement, subject to no Appeal being raised.

6 Impacts

Does this modification impact a Significant Code Review (SCR) or other significant industry change projects, if so, how?

No.

Pre-Project Nexus Implementation

Yes. Implementation is required pre-Project Nexus Implementation as the go-live date for the ETTOS is 01 September 2016.

7 Legal Text

Text Commentary

The legal text introduces a new permission for release of protected data. Paragraph 5.5.3 (l) describes the person to whom the data can be released (ETTOS), the circumstances of release (allegation of potential theft) and the data item (supplier identity).

Text

TRANSPORTATION PRINCIPAL DOCUMENT

SECTION V - GENERAL

Amend paragraph 5.5.3(j) to read:

“5.5.3(j) to any person pursuant to an application made in accordance with paragraph 7.3 (‘Other User Access’) of Schedule 23, version dated 7 November 2008, contained in the Supply Point Administration Agreement (‘SPAA’) 11th June 2004 made between the parties listed in Schedule 1 of the SPAA; ~~or~~”

Amend paragraph 5.5.3(k) to read:

“5.5.3(k) to the Performance Assurance Framework Administrator, provided the terms of the relevant PAFA Contract require the Performance Assurance Framework Administrator to maintain the confidentiality of such information on terms no less onerous than those of this paragraph 5, save to the extent disclosure of such information is necessary to comply with the terms of the PAFA Contract; ~~;~~ or”

Add new paragraph 5.5.3(l), as follows:

“5.5.3(l) to a person appointed pursuant to the SPAA to provide Energy Theft Tip-off Services (“**ETTOS**”) when information is received by that person of an allegation of a potential theft of gas at a premises and the identity of the relevant Supplier is required. For the purposes of the Code ETTOS shall have the same meaning as contained within SPAA”

8 Consultation Responses

The summaries in the following table(s) are provided for reference on a reasonable endeavours basis only. It is recommended that all representations be read in full when considering this Report. Representations are published alongside this Report.

Of the 10 representations received implementation was unanimously supported.

Representations were received from the following parties:

Organisation	Response	Relevant Objectives	Key Points
British Gas	Support	d (i) – positive d (ii) – positive f – positive	<ul style="list-style-type: none"> • Will enable suppliers to promptly act upon potential theft leads made to the Energy Theft Tip-Off Service (ETTOS), it is essential that any tip-off is provided to the incumbent supplier as soon as possible after receipt. Without this modification the ETTOS provider will be unable to ascertain the identity of the supplier and subsequently prevent any tip-off from being investigated. • Supports self-governance status. • Support implementation in readiness for the go-live date of ETTOS on 1 September 2016.
EDF Energy	Support	d (i) – positive d (ii) – positive f – positive	<ul style="list-style-type: none"> • Will assist with better identification of theft as it will ensure that the appropriate Supplier is made aware of potential theft. • Supports self-governance status. • Implementation supported for 01 September.
E.ON UK	Support	d (i) – positive d (ii) – positive f – positive	<ul style="list-style-type: none"> • Ensuring the appropriate Supplier is able to be made aware of potential theft will help the management of theft detections. • Supports self-governance status. • Implementation as quickly as possible will facilitate data matching in preparation for the service going live on 01 September 2016.
National Grid Distribution	Support	d - positive f - positive	<ul style="list-style-type: none"> • The ETTOS provider requires the identity of the Supplier in order to efficiently and correctly route information provided via the theft of gas tip off line. This modification will allow the release of such information to aid this process. • Agree with the funding statement and implementation timescales • Satisfied text meets the requirement of the

			modification.
Northern Gas Networks	Support	d (i) – positive d (ii) – positive f – positive	<ul style="list-style-type: none"> • This Modification will provide the Transporters with the necessary permissions to provide the Supplier identity of a supply point to the ETTOS Service Provider on receipt of a tip-off. • Supports self-governance status. • Implemented, in line with the timescales for self-governance.
RWE npower	Support	d (i) - positive d (ii) - positive f - positive	<ul style="list-style-type: none"> • Provides Transporters with the necessary permissions to release Supplier identity to the ETTOS Service Provider and enable faster investigation by the appropriate Supplier. • Will enable the detection of energy theft by ensuring that the correct Supplier is made aware of potential theft. • Supports self-governance status. • Implementation as soon as possible, prior to the go live date for ETTOS.
Scotia Gas Networks	Support	d (i) - none d (ii) - positive f - positive	<ul style="list-style-type: none"> • Provides Gas Transporters with the relevant permission to release the Supplier ID, and therefore facilitates the delivery of the ETTOS, in a continued commitment to work with the industry to prevent and manage theft of gas. • No costs will be incurred as a result of this modification as it creates permissions only. • Supports self-governance status. • Implementation is required in advance of 01 September, when the service is due to go live.
Scottish Power	Support	d (i) - positive d (ii) - positive f - positive	<ul style="list-style-type: none"> • Supports the management of theft investigations and ensures the correct Supplier is made aware of potential theft. • Allowing Transporters to release Supplier identities will enable suspected theft to be investigated quicker and by the appropriate Supplier. • Supports self-governance status. • Implementation in advance of 01 September.
SSE	Support	d (i) - positive d (ii) - positive f - positive	<ul style="list-style-type: none"> • The modification will improve the theft of gas investigative process. • In order for the ETTOS service to be effective, Users must provide permission for the identity of the

			<p>Supplier of a Supply Meter Point to be made available to the ETTOS Provider.</p> <ul style="list-style-type: none"> • This modification will create the permissions within the UNC to permit the release of data to the ETTOS Provider and enable the ETTOS Provider to provide the relevant Supplier with theft information. • Supports self-governance status. • Modification should be implemented as soon as possible, in line with the timescales for self-governance.
Wales & West Utilities	Support	<p>d (i) - positive d (ii) - none f - positive</p>	<ul style="list-style-type: none"> • Gives permission for Transporters to release the identity of the Supplier for a single Supply Point in response to a request from the Energy Theft Tip off Line (ETTOS) service provider. • Meets the requirements of the ETTOS in a proportionate way. • Primary benefit is to Suppliers and the efficient provision of the service enabled by this modification. • Will assist in tackling theft thereby securing effective competition between Suppliers. • Supports self-governance status • Go-live date for the ETTOS is 1 September 2016 subject to the approval of SPAA CP 16 325 by the Authority.

Please note that late submitted representations will not be included or referred to in this Final Modification Report. However, all representations received in response to this consultation (including late submissions) are published in full alongside this Report, and will be taken into account when the UNC Modification Panel makes its assessment and recommendation.

9 Panel Discussions

Discussion

The Chair summarised that Modification 0584S would provide the Transporter with the necessary permissions within the UNC to release the Supplier identity of the supply point to the Energy Theft Tip-Off Service (ETTOS) Provider on receipt of a tip-off. This will enable the ETTOS Provider to provide the relevant Supplier with the tip-off information and Suppliers to more effectively tackle instances of theft of gas.

Members considered the representations made noting that, of the 10 representations received implementation was unanimously supported.

Consideration of the Relevant Objectives

Members considered relevant objectives d), and f), agreeing that implementation would have positive

impacts because ensuring that relevant permissions are in place to facilitate the Energy Theft Tip-Off Service (ETTOS) will improve the efficiency of administration of code elements relevant to theft of gas and secure effective competition between Shippers and Suppliers as sending theft of gas tip-offs to the relevant Supplier will enable them to more effectively tackle instances of theft of gas, reducing the costs to consumers and Shippers.

Panel Determinations

Members voted unanimously to recommend implementation of Modification 0584S.

10 Recommendation

Panel Recommendation

Having considered the Modification Report, the Panel determined that:

- proposed self-governance Modification 0584S should be made.